

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

PARKER TIRRELL and IRIS TURMELLE,

*Plaintiffs,*

v.

FRANK EDELBLUT, in his official capacity  
as Commissioner of the New Hampshire  
Department of Education, *et al.*,

*Defendants.*

Case No. 1:24-cv-00251-LM-TSM

**JOINT STATEMENT OF SCHOOL DISTRICT DEFENDANTS AS TO DISCOVERY  
PLANNING**

NOW COME the school district Defendants, the Pemi-Baker and Pembroke School Districts, by and through their respective counsel, and jointly submit the following statement regarding Discovery Planning pursuant to Rule 26(f) of the Federal Rules of Civil Procedure and Rule 26.1 of the Local Rules of the United States District Court for the District of New Hampshire.

The Petitioners and the State have submitted or will submit different Discovery Plans. The District Defendants do not intend to conduct discovery of their own, do not wish to further complicate the matter of discovery planning by filing a third possible schedule, and thus will await the outcome of the upcoming Conference with the Court.

WHEREFORE, the parties respectfully request that this Honorable Court:

- A. Accept this joint Statement of School District Defendants as to Discovery Planning; and
- B. Grant such further relief as this Court deems just and proper.

Respectfully submitted,

PEMBROKE SCHOOL DISTRICT,  
ANDREW CAMIDGE, GENE GAUSS, KERRI  
DEAN, AND MELANIE CAMELO AS  
MEMBERS OF THE PEMBROKE SCHOOL  
BOARD IN THEIR OFFICIAL CAPACITIES,

By their attorneys,  
WADLEIGH STARR & PETERS, PLLC

Date: November 14, 2024

By: /s/ Michael G. Eaton  
Michael G. Eaton, Esq. (NH Bar #271586)  
WADLEIGH STARR & PETERS, PLLC  
95 Market Street  
Manchester, NH 03101  
(603) 206-7292  
[meaton@wadleighlaw.com](mailto:meaton@wadleighlaw.com)

PEMI-BAKER REGIONAL SCHOOL  
DISTRICT, BONNIE ACTON, GREG  
APRILLIANO, LISA ASH, PAUL CIOTTI,  
SHEILA DONAHUE, PETER JACKSON, PHIL  
MCCORMACK, BERNICE SULLIVAN, TONY  
TORINO, CAROLYN VARIN, BARBARA  
NOYES, AND PAUL PIZZANO AS  
MEMBERS OF THE PEMI-BAKER  
REGIONAL SCHOOL BOARD IN THEIR  
OFFICIAL CAPACITIES,

By their attorneys,  
SOULE, LESLIE, KIDDER, SAYWARD &  
LOUGHMAN, P.L.L.C.

By: /s/ Diane M. Gorrow  
Diane M. Gorrow, Esq. (NH Bar #4817)  
220 Main Street  
Salem, NH 03079  
(603) 898-776  
Email: [gorrow@soulefirm.com](mailto:gorrow@soulefirm.com)

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on all parties of record through the Court's e-filing system.

/s/ Michael G. Eaton

Michael G. Eaton